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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
LAS VEGAS DIVISION

27 COLUMBINE DEVINCENT BATALONA,) Case No: 2:18-cv-02309-JAD-VCF
28)
29 Plaintiff)
30)
31 v.)
32)
33 NANCY A. BERRYHILL, Acting)
34 Commissioner of Social Security,)
35)
36 Defendant.)
37)
38)

39 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security, hereby requests
40 an extension of time of fifteen days to Monday, July 15, 2019, to prepare and file her cross
41 motion to affirm. This is the Commissioner's first request for an extension.

42 Defendant respectfully requests this extension of time because of a very heavy workload,
43 and because of upcoming leave planned around the Fourth of July federal holiday.

On June 28, 2019, Plaintiff's counsel informed Defendant by email that he had no objection to this extension.

Respectfully submitted,

Date: July 1, 2019

LAW OFFICES OF LAWRENCE D. ROHLFING

By:

/s/ Cyrus Safa*

CYRUS SAFA

*authorized by email June 28, 2019

Attorney for Plaintiff

Date: July 1, 2019

NICHOLAS A. TRUTANICH

United States Attorney

By:

/s/ Michael K. Marriott

MICHAEL K. MARRIOTT

Assistant Regional Counsel

Attorneys for Defendant

Of Counsel

Jeffrey Chen

Assistant Regional Counsel

Social Security Administration

IT IS SO ORDERED.

DATE:

Carl Gaddis

HONORABLE CAM FERENBACH
United States Magistrate Judge

CERTIFICATE OF SERVICE

I, Michael K. Marriott, hereby certify that I caused a copy of Stipulation for Extension of Time to File Defendant's Cross Motion to Affirm to be served, via CM/ECF notification, on:

Cyrus Safa
Law Offices of Lawrence D. Rohlffing
12631 E. Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670

Date: July 1, 2019

NICHOLAS A. TRUTANICH
United States Attorney

By: /s/ Michael K. Marriott
MICHAEL K. MARRIOTT
Assistant Regional Counsel

Attorneys for Defendant